

## **EXHIBIT 1**



# STEIN SPERLING

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ATTORNEY AT LAW  
PRINCIPAL

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July 15, 2025

File Number: 2220401.01

**VIA ELECTRONIC MAIL ONLY**

Joyce Smithey  
706 Giddings Avenue  
Suite 200  
Annapolis, Maryland 21401  
[Joyce.smithey@smithelaw.com](mailto:Joyce.smithey@smithelaw.com)

Re: Compass Marketing vs. Daniel White, et al

Dear Ms. Smithey:

It has just today come to my attention (via the two attached documents, among other things) that you were the court appointed mediator in the case of *George White vs. Ronald Bateman*, Case No. C-02-CV-000778 in the Circuit Court of Anne Arundel County, Maryland. As you certainly are aware, that case involved George White's claim for defamation against Mr. Bateman arising out of the very facts and circumstances that form the essential part of the complaint you have brought against George White on behalf of Compass Marketing, Inc. in the pending matter. As you further are aware, you received from George White a mediation statement in that case.

I am truly at a loss to understand upon what basis you feel it is appropriate to now represent a client in a related matter that is directly adverse to George White, who was a party to the mediation over which you presided. Before any further action is taken in light of this situation, I request an immediate written response from you to set forth your position as to why you feel you are not conflicted from undertaking your role here as counsel suing George White. Please provide me your response no later than **tomorrow, July 16, 2025**.

Thank you for your immediate attention to this matter.

Very truly yours,

  
Jeff Schwaber (Jul 15, 2025 16:34 EDT)  
Jeff M. Schwaber

Enclosures

JMS:srm

GEORGE WHITE \* IN THE  
*Plaintiff(s)* \* CIRCUIT COURT  
v. \* FOR  
RONALD BATEMAN \* ANNE ARUNDEL COUNTY  
*Defendant(s)* \* CASE NO. C-02-CV-21-000778

\* \* \* \* \*

**ORDER FOR MEDIATION**

This Order is your official notice of dates and requirements regarding mediation. It is this 21st day of October, 2021, **ORDERED, that:**

It is the policy of this Court to encourage and promote the early and effective use of Alternative Dispute Resolution (ADR).

The Court having concluded that this case may benefit from the mediation program of this Court, it is ordered that this matter be referred to:

Mediator: Joyce E. Smithey, Esquire  
706 Giddings Avenue  
Suite 200  
ANNAPOLIS, MD 21401  
410-919-2990

**The parties shall attend one (1) mediation session with the mediator, approximately two (2) hours in length. Deadline to complete mediation: 05/17/2022**

**The cost of mediation shall be equally divided between the parties. The cost of mediation is \$ 200.00 per hour (total of \$ 400.00). Full payment per party shall be made to the mediator at the beginning of the session. Failure to attend mediation does not excuse payment of the fee for the missed session. FURTHERMORE, FAILURE TO ATTEND COURT ORDERED MEDIATION WILL RESULT IN POSSIBLE SANCTIONS AT THE PRETRIAL SETTLEMENT CONFERENCE.**

A. That the parties shall have at least one bona fide conference with the mediator, to be held no less than thirty (30) days before the Pretrial Settlement Conference. Within that time, other conferences may be scheduled at the discretion of the mediator.

B. That all discovery necessary to make the mediation meaningful must be completed by the mediation date unless all counsel and the mediator agree to proceed at the

10/21/2021 AV

mediation date without discovery having been completed. If counsel anticipate that the discovery will not be completed by the mediation date, they shall notify the mediator at least ten (10) days in advance of the mediation date to determine whether counsel and the mediator can agree to hold the mediation without the completion of discovery. The discovery deadlines controlling in this case are set forth in the parties' Scheduling Order. The provisions herein are only intended to ensure that sufficient discovery is concluded prior to the mediation to ensure a meaningful conference.

C. That all parties and counsel must appear at the mediation. If there is insurance coverage and/or if settlement terms must be approved by a claims supervisor, claims committee, government official, or other individual or individuals, that person or those persons, with full authority, must appear and be prepared to discuss in good faith settlement of all issues. Failure to comply with this provision may result in the imposition of sanctions, including the assessment of counsel fees and costs, pursuant to MD Rule 2-508(e).

D. That a Settlement statement will be mailed to all parties or their counsel by the mediator. It shall be returned to the mediator fifteen (15) days before the scheduled mediation. This statement is confidential and is not to be served on the other side or filed with the Court.

That all proceedings at the conference, including any statements made or documents prepared for the conference by any party, attorney or other participant, are privileged and shall not be disclosed to the trial judge or construed as an admission against interest unless otherwise agreed. No party shall be bound by anything said or done at the conference unless a settlement is reached.

That if a settlement is reached at the mediation, the mediator shall advise the Court of the results by submitting to the ADR Coordinator the Civil Mediation Disposition Form within ten (10) days after the mediation. Additionally, the parties shall file a timely Stipulation of Dismissal or an Order of Satisfaction with the Court.

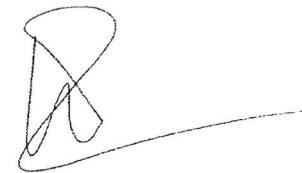
G. Plaintiff's counsel shall notify the mediator in writing of any postponements or newly named parties. In the event a settlement agreement is reached or the case is dismissed prior to using the ADR services, counsel shall notify the mediator immediately.

Pursuant to MD Rule 17-202(f), a party, within thirty (30) days after entry of this Order, may file an objection to the referral, an alternative proposal, or a "Request to Substitute ADR Practitioner" substantially in the form set forth in the Rule. If the Order for Mediation delegates authority to an ADR organization to designate an ADR practitioner, the objection, alternative proposal, or "Request to Substitute ADR Practitioner" shall be filed no later than 30 days after the party is notified by the ADR organization of the designation.

If a party seeks to file a Fee Waiver, it must be filed within fifteen (15) days of entry of the Order for Mediation; or if the party was served after entry of the Order for Mediation, the

**Fee Waiver must be filed within fifteen (15) days of service of the Complaint/Petition in this case upon that party<sup>1</sup>.**

If an attorney and/or party fail to participate in alternative dispute resolution or other proceedings as ordered without having first obtained a postponement or other waiver of this Court, a Show Cause Order will be issued. A Show Cause Hearing will then be held to determine why sanctions should not be imposed on the offending party or counsel. Monetary or other sanctions may be imposed on any attorney or party who fails to comply with an order of this Court issued in accordance with the Civil Differentiated Case Management Plan.



WILLIAM C. MULFORD, II, Judge  
Circuit Court for Anne Arundel County

Copies:  
Counsel  
Mediator

Order for Mediation: Approved August 2015

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<sup>1</sup> Mediation Fees for government entities, parties represented by Legal Aid Bureau, Inc., and Maryland Volunteer Legal Services are waived automatically.

# SMITHEY LAW GROUP

LABOR & EMPLOYMENT LAW

Joyce E. Smithey, Esq.

[joyce.smithey@smitheylaw.com](mailto:joyce.smithey@smitheylaw.com)

Phone: (410) 919-2990

August 8, 2022

**Via U.S. Mail:**

Brendan Callahan, Esq.  
PO Box 1091  
Prince Frederick, MD 20678

Stephen B. Stern, Esq.  
Heather K. Yeung, Esq.  
238 West Street  
Annapolis, MD 21401

Re: George White v. Ronald Bateman  
Case No.: C-02-CV-21-000778

Dear Parties:

This letter serves as confirmation of the mediation session scheduled in the above-captioned case. I look forward to serving as mediator in this matter on:

Date: August 10, 2022  
Time: 10:00 a.m.  
Location: Smithey Law Group LLC; 706 Giddings Avenue, Suite 200  
Annapolis, MD 21401

According to the Court's instructions, it is necessary for attorneys and parties with settlement authority to attend the mediation.

Each party must provide me with a Mediation Conference Statement. Any information supplied in the Statements will be kept confidential and will neither be disclosed to any other party nor filed with the court.

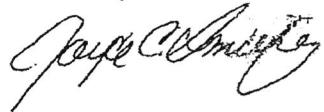
My fee for mediation based on the court approved hourly rate, is \$200.00 per hour, to be divided equally by the Plaintiff and the Defendants. The Court has ordered two (2) hours of mediation. If all parties agree that additional time for mediation is necessary, my fee will continue at the same rate. Please remit payment on our website ([www.smitheylaw.com](http://www.smitheylaw.com)) as follows: Plaintiff - \$200; Defendant - \$200.

Brendan Callahan, Esq.  
Stephen B. Stern, Esq.  
Heather K. Yeung, Esq.  
August 8, 2022  
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Enclosed is an Agreement to Mediate. Please sign (both attorney and client) and return it to me at your earliest convenience. Please also forward to me a copy of the complaint and any relevant pleadings in this matter.

If you have any questions or concerns, please don't hesitate to contact me. I look forward to hearing from you.

Sincerely,



Joyce E. Smithey

Enclosure

# Letter from J. Schwaber to J. Smithey

Final Audit Report

2025-07-15

Created:	2025-07-15
By:	Sarah Michaels (smichaels@steinsperling.com)
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## "Letter from J. Schwaber to J. Smithey" History

- ✉ Document created by Sarah Michaels (smichaels@steinsperling.com)  
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- ✉ Document emailed to Jeff Schwaber (JSchwaber@steinsperling.com) for signature  
2025-07-15 - 8:33:35 PM GMT
- ✉ Email viewed by Jeff Schwaber (JSchwaber@steinsperling.com)  
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- ✍ Document e-signed by Jeff Schwaber (JSchwaber@steinsperling.com)  
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2025-07-15 - 8:34:22 PM GMT



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